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15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
17 **SAN FRANCISCO DIVISION**

18  
19 MAXIMILIAN KLEIN, et al., on behalf of  
20 themselves and all others similarly situated,

21 Plaintiffs,

22 v.  
23

META PLATFORMS, INC., a Delaware  
24 Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF DAVID Z. GRINGER  
IN SUPPORT OF DEFENDANT META  
PLATFORMS, INC.’S MOTION TO  
EXCLUDE EXPERT TESTIMONY AND  
OPINIONS OF JOSEPH FARRELL**

Judge: Hon. James Donato

I, DAVID Z. GRINGER, declare as follows:

1. I am a partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I represent Defendant Meta Platforms, Inc. in the above-captioned action. I submit this declaration in support of Meta’s Motion to Exclude Expert Testimony and Opinions of Joseph Farrell.

2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the transcript from Joseph Farrell's merits deposition, held on March 15, 2024.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Expert Merits Report of Joseph Farrell, dated January 12, 2024.

10           4. Attached hereto as Exhibit 3 is a true and correct copy of the Expert Merits  
11 Rebuttal Report of Joseph Farrell, dated February 9, 2024.

12        5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the Expert  
13 Merits Report of Dennis Carlton, dated January 12, 2024.

I declare that the foregoing is true and correct under penalty of perjury.

15 Executed on this 5th day of April, 2024, in New York, New York.

By: /s/ David Z. Gringer  
David Z. Gringer

## **SIGNATURE ATTESTATION**

This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

By: /s/ Sonal N. Mehta  
Sonal N. Mehta